

FILED
FEB 09 2022
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HERSHEL HILL,

Defendant.

) CASE NO.:
)
)
)
)
)
)
)
)
)

3:22 CR 22
JUDGE ZOUHARY
MAG. JUDGE CLAY

MOTION TO SEAL INDICTMENT

Now comes the United States of America, by and through counsel, Bridget M. Brennan, United States Attorney, and Robert N. Melching, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): the court has authorized an arrest warrant be issued for the defendant on the basis of the Indictment and disclosure of the same at this time may provide an opportunity for the defendant to flee prior to apprehension and/or risk harm to the officers who attempt to execute the warrant.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should the defendant be

located in another judicial district and a certified copy of this indictment is needed for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

MICHELLE M. BAEPPLE
Acting United States Attorney

By: /s/ Robert N. Melching
Robert N. Melching (MI: P80488)
Assistant United States Attorney
Four Seagate, Suite 308
Toledo, OH 43604
(419) 241-0755
(419) 259-6360 (facsimile)
Robert.Melching@usdoj.gov